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July 20, 2021

VIA ECF

Honorable LaShann DeArcy Hall
United States District Court, E.D.N.Y.
225 Cadman Plaza East, Courtroom 4H North
Brooklyn, New York 11201

**Re: Hector Polanco v. Parts Authority, LLC,
et al.
Case No. 21-cv-02957**

Dear Judge Hall:

We represent Parts Authority, LLC, Parts Authority, Inc. and Yaron Rosenthal (collectively, “Defendants”), in the above-referenced matter. We write pursuant to Rule I.E. of the Court’s Individual Rules to request an extension of time to answer, move or otherwise respond to Plaintiff’s Complaint to permit the parties to complete a mediation in an attempt to resolve this purported class and collective action, as well as three pending cases in arbitration. Defendants’ response to the Complaint presently is due July 26, 2021. The parties have agreed to conduct a mediation on October 7, 2021 before JAMS mediator Stephen Sonnenberg. Accordingly, Defendants request an extension through and including October 15, 2021, to afford the parties an opportunity to resolve the case through mediation. This is the second request for an extension of this deadline. Plaintiff’s Counsel consents to this request and the Parties’ agreement is reflected in a stipulation attached hereto for Your Honor’s consideration. No other scheduled dates will be affected if the Court grants this request.

We thank the Court for its attention to this matter.

Respectfully submitted,
JACKSON LEWIS P.C.

Jeffrey W. Brecher
Jeffrey W. Brecher

cc: Jeremiah Frei-Pearson, Esq. (via ECF)
Mark Potashnick, Esq. (via ECF)
4829-7193-4706, v. 1

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JACKSON LEWIS P.C.
ATTORNEYS FOR DEFENDANTS
PARTS AUTHORITY, LLC,
PARTS AUTHORITY, INC., and
YARON ROSENTHAL
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ATTORNEYS OF RECORD:
JEFFREY W. BRECHER, ESQ.
ALESSANDRO VILLANELLA, ESQ.
BRENDAN SWEENEY, ESQ.

-----X		
HECTOR POLANCO, for himself and all other similarly situated,		Case No. 21-cv-2957 STIPULATION REGARDING TIME TO RESPOND TO COMPLAINT
Plaintiff,		
vs.		
PARTS AUTHORITY, LLC, PARTS AUTHORITY, INC., and YARON ROSENTHAL.		
Defendants.		
-----X		

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the parties,
that:

1. Defendants' time to answer, move or otherwise respond to the Complaint is extended to October 15, 2021.
2. The statute of limitation for claims brought pursuant to the Fair Labor Standards Act ("FLSA") on behalf of any putative opt-in within the scope of the putative collective action shall be tolled for the period beginning the date the parties execute

this Stipulation up to and including the date on which Defendants answer, move or otherwise respond to the Complaint.

By: s/
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Attorneys for Plaintiff

Dated: July 20, 2021

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Attorneys for Defendants

Dated: July 20, 2021

SO ORDERED:

THE HONORABLE LASHANN MOUTIQUE DEARCY HALL, U.S.D.J.

Dated: _____, 2021